

STEPHANIE M. HINDS (CABN 154284)
United States Attorney
MICHELLE LO (NYRN 4325163)
Chief, Civil Division
MICHAEL A. KEOUGH (NYRN 5199666)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, CA 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-6748
michael.keough@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Plaintiff Sharon S. Chand (“Plaintiff”), and Defendant Michael S. Regan (“Defendant”), hereby STIPULATE and respectfully REQUEST that the Court (1) continue the date for the parties to exchange General Order 71 disclosures until December 9, 2022 and (2) vacate and continue the Case Management Conference, presently scheduled for December 1, 2022, until January 12, 2022, or as soon thereafter as the Court is available.

This action, filed on October 5, 2021, includes four causes of action related to claims for employment discrimination. *See* Dkt. 1. Defendant was served on December 27, 2021. Defendant moved to dismiss the Complaint on February 25, 2022. *See* Dkt. 16. On July 1, 2022, the Court granted the motion to dismiss for two of Plaintiff's claims, and denied the motion for Plaintiff's two remaining claims. *See* Dkt. 27. The Court directed that Plaintiff file an Amended Complaint within 30 days, and

1 Plaintiff did so on August 1, 2022. *See* Dkt. 32. Defendant filed a motion to dismiss certain claims in
2 the Amended Complaint on September 16, 2022, *see* Dkt. 35, which was submitted without oral
3 argument pursuant to Civil Local Rule 7-1(b) on October 27, 2022. *See* Dkt. 41.

4 On August 10, 2022, the Court so-ordered the parties' proposed case schedule (*see* Dkt. 34)
5 which set November 10, 2022 as the date for the parties to exchange General Order 71 disclosures, and
6 directed Defendant to file an answer to all of Plaintiff's remaining claims 14 days after the pending
7 motion to dismiss is decided or the final complaint is filed. On November 8, 2022, Plaintiff requested a
8 one-time extension of her time to provide General Order 71 disclosures due to a recent illness.
9 Defendant consented to this request. The parties also discussed continuing the Case Management
10 Conference until after the pending motion to dismiss is decided and/or after Defendant has answered the
11 Complaint.

12 Accordingly, the parties request that the Court (1) continue the date for the parties to exchange
13 General Order 71 disclosures until December 9, 2022 and (2) vacate and continue the Case Management
14 Conference, presently scheduled for December 1, 2022, until January 12, 2022, or as soon thereafter as
15 the Court is available.

16 SO STIPULATED.

17
18 Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

19
20 Dated: November 8, 2022 By: /s/ Michael A. Keough
MICHAEL A. KEOUGH
Assistant United States Attorney
Attorney for Defendant

21
22
23 Dated: November 8, 2022 By: **/s/ Sharon S. Chand
SHARON S. CHAND

24
25 Plaintiff *Pro Se*

26 ** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document
27 has obtained approval from this signatory.

ORDER

IT IS HEREBY ORDERED that the parties shall exchange General Order 71 disclosures by December 9, 2022. IT IS FURTHER ORDERED that the Case Management Conference, presently scheduled for December 1, 2022, is vacated and continued until January 12, 2023.

Dated: November 9, 2022


HON. RICHARD SEEGERS

HON. RICHARD SEEBORG
United States District Judge